

STOKES
BARTHOLOMEW
EVANS & PETREE
A PROFESSIONAL ASSOCIATION

NASHVILLE • MEMPHIS • MUSIC ROW

424 CHURCH STREET, SUITE 2800
NASHVILLE, TENNESSEE 37219-2386
(615) 259-1450 • FAX: (615) 259-1470
www.stokesbartholomew.com

GUILFORD F. THORNTON, JR.
gthornton@stokesbartholomew.com

RECEIVED
DEC 6 PM 3 25
Direct Dial: 615/259-1492
Direct Fax: 615/687-1507

TN REGULATORY AUTHORITY
DOCKET ROOM

December 6, 2002

The Honorable Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

RE: Complaint of Aeneas Communications Against Citizens Communications in
Weakley County, Tennessee

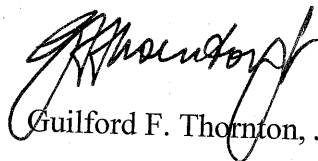
Docket No. 02-00438

Dear Chairman Kyle:

Consistent with the procedural schedule set forth in this matter, I am enclosing with this letter Citizens' responses to discovery requests from Aeneas. Copies have been served on counsel for all parties in this matter.

Should you have any questions or require anything further at this time, please do not hesitate to contact me.

Sincerely,


Guilford F. Thornton, Jr.

cc: Mike Swatts
Gregg Sayre

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

December 6, 2002

**IN RE: Complaint of AENEAS Communications Against Citizens Communications
 in Weakley County, Tennessee**

Docket No. 02-00438

**CITIZENS TELECOMMUNICATIONS COMPANY OF TENNESSEE, LLC'S
RESPONSE TO AENEAS'S FIRST ROUND OF DISCOVERY REQUESTS**

Citizens Telecommunications Company of Tennessee, LLC ("Citizens") responds to Aeneas's First Round of Discovery Requests as follows:

INTERROGATORIES

1. Describe how Citizens currently routes calls made by a Citizens subscriber in Weakley County to an Aeneas subscriber located in that same county.

ANSWER:

Citizens objects to this question to the extent it seeks to categorize the calls at issue as calls necessarily within Weakley County, Tennessee.

With respect to calls from Citizens' customers in its Martin exchange to Aeneas' customers in Greenfield, Tennessee, calls from Citizens' customers in its Martin exchange are routed over the existing EAS network to the BellSouth meet point. From there, on information and belief, the calls were routed and may still be routed through Bellsouth's Jackson hub to Aeneas' switch, which, according to the Local Exchange Routing Guide (the "LERG"), is physically located in Jackson, although it serves Aeneas' customers in Greenfield.

2. Has Citizens always routed such calls in the manner described in response to Question 1? If not, describe the manner in which Citizens formerly routed such calls, the date when Citizens changed the manner of routing those calls, and the reason for the change.

ANSWER:

Yes.

3. If Citizens routed such calls as described above to a BellSouth tandem switch describe any applicable charges Citizen would have to pay for routing such calls in that manner.

ANSWER:

Citizens is without sufficient information to respond to this request concerning prospective charges from BellSouth.

4. If Citizens, at any time in the past, routed such calls as described above to a BellSouth tandem, (a) provide the monthly number of minutes of such traffic for the most recent twelve month period and (b) provide the monthly charges, if any, paid by Citizens to BellSouth for routing such calls in that manner during the same period.

ANSWER:

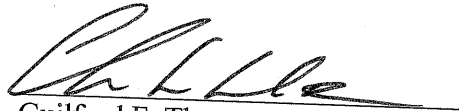
Pursuant to Citizens' answer to #2 above, this question is not applicable to the circumstances at hand in this case.

5. In making decisions concerning the exchange of traffic among carriers, does Citizens adhere to the Local Exchange Routing Guide? Please explain what circumstances, if any, would cause Citizens to depart from the Local Exchange Routing Guide.

ANSWER:

Citizens utilizes the LERG to determine whether a call is local or toll based on the rate center. Citizens is not aware of any instance where it has departed from the LERG in Tennessee.

Respectfully submitted,



Guilford F. Thornton, Jr.
Charles W. Cook III
424 Church Street, Suite 2800
Nashville, TN 37219
615/259-1450

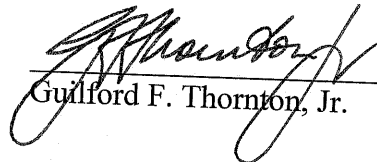
Counsel for Citizens Telecommunications
Company of Tennessee, LLC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via fax or hand delivery and U.S. mail to the following on this the 6th day of December, 2002.

Henry Walker
Boult Cummings Conners & Berry
414 Union Street, Suite 1600
Nashville, TN 37219

Jonathan Wike
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238



Guilford F. Thornton, Jr.